

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**TIMOTHY PAGE, TREVOR PAGE,  
TICINO CAPITAL LIMITED,  
WELLESLEY HOLDINGS LIMITED,  
PORRIMA LIMITED, EMERGENT  
INVESTMENTS COMPANY, and FJ  
INVESTMENTS INTERNATIONAL  
INC.,**

**Defendants,**

**JANAN PAGE,**

**Relief Defendant.**

**Civil Action No. 21-cv-**

**PLAINTIFF’S MOTION FOR AN  
ORDER FREEZING AND REPATRIATING ASSETS**

Pursuant to Fed. R. Civ. P. 65(b), plaintiff United States Securities and Exchange Commission (the “Commission” or “SEC”) hereby files this motion for entry of an order freezing and repatriating assets belonging to defendants Timothy Page, Trevor Page, Ticino Capital Limited (“Ticino”), Wellesley Holdings Limited (“Wellesley”), Porrima Limited (“Porrima”), Emergent Investments Company (“Emergent”) and FJ Investments International Inc. (“FJ Investments”) (collectively “Defendants”) as well as assets belonging to Relief Defendant Janan Page. A proposed form of Order is attached hereto. In support of this motion, the Commission submits the accompanying memorandum of law, the declaration of Trevor Donelan and the declaration’s six exhibits.

WHEREFORE, the Commission respectfully requests that the Court enter the Order Freezing and Repatriating Assets filed herewith.

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION  
By its attorneys,

/s/ Alicia Reed

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DATED: September 23, 2021

### **Certificate of Service**

I hereby certify that, on September 23, 2021, a true and correct copy of the foregoing document, as well as the accompanying proposed order, memorandum of law and the Declaration of Trevor Donelan and its exhibits, was filed through the Court's CM/ECF system, and accordingly, the document will be sent electronically to all participants registered to receive electronic notice in this case. In addition, the Commission has served a copy of the foregoing document on the following individuals and entities, who are not represented or registered to receive electronic notices in this case, at the following addresses and by the following means:

**Defendants:**

Timothy Page

By email address used in connection with Mr. Page's brokerage and bank accounts

Trevor Page

By email address used in connection with Mr. Page's brokerage and bank accounts

Ticino Capital Limited, Wellesley Holdings Limited, Porrima Limited, Emergent Investments Company

By email address used in connection with their brokerage and bank accounts

FJ Investments International Inc.

By overnight delivery to its business address

**Relief Defendant:**

Janan Page

By email address used in connection with Ms. Page's brokerage and bank accounts

/s/ Alicia Reed

Alicia Reed